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10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN JOSE DIVISION
14

15 IN RE HIGH-TECH EMPLOYEE ANTI-
16 TRUST LITIGATION

17 THIS DOCUMENT RELATES TO:
18 ALL ACTIONS
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Master Docket No. 11-CV-2509 LHK

**[PROPOSED] ORDER GRANTING
DEFENDANTS' JOINT RESPONSE TO
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF PLAINTIFFS' MOTION TO
EXCLUDE EXPERT TESTIMONY
PROFFERED BY DEFENDANTS**

Having considered Defendants' Joint Response to Plaintiffs' Administrative Motion to Seal Portions of Plaintiffs' Motion to Exclude Expert Testimony Proffered by Defendants and the Declarations submitted in support thereof, GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Defendants' Joint Administrative Motion is GRANTED and the following be filed under seal:

Exhibit to Cisneros Decl.	Title	Filed Under Seal/ Redacted
2	<p>Expert Report of Lauren J. Stiroh, November 25, 2013:</p> <ul style="list-style-type: none"> • ¶¶ 20-28, pages 10-14; • ¶ 30, page 14; • ¶¶ 32, pages 14-15; • Footnote 65, page 14; • Footnote 69, page 15; • ¶¶ 33-36, pages 15-16; • Footnotes 76-79, 81, page 16; • ¶ 38, page 17; • ¶¶ 40-41, page 17; • Footnotes 85-87, pages 17-18; • ¶ 43, page 19; • Footnotes 93-95, 100, page 19; • ¶¶ 45-47, pages 20-21; • Footnotes 102, 104-105, page 20; • ¶¶ 50-67, pages 22-27; • Footnotes 116-117, page 23; • Footnote 130, page 24; • ¶ 71, page 28; • ¶ 77, page 29; • ¶¶ 79-82, pages 30-31; • Footnote 189, page 36; • ¶¶ 111-112, pages 42-43; • Footnotes 206-207, page 42; • Footnote 210, page 43; • ¶ 121-122, page 46; • Footnote 225, page 46; • ¶ 134-140, pages 50-52; 	Redacted

	<ul style="list-style-type: none"> • Footnote 235, page 51; • Footnotes 236-237, page 52; • ¶ 180, page 66; • ¶ 193, page 70; • ¶ 201, page 72; • ¶ 206, page 74; • ¶ 209, page 75; • Exhibit III.3-16, 19-32, 34-55; • Exhibit IV.1, 3-5, 7-16, 19, 20-24, 26-30, 33, 35-37, 39, 40; • Exhibit V.5; • Exhibit VII.3; and • Appendix Exhibit III.1 	
4	<p>Expert Report of David Lewin, Ph.D., dated November 25, 2013:</p> <ul style="list-style-type: none"> • Table of Contents, page 2; • ¶ 28, pages 14-15; • Figure 1, page 15; • ¶ 30, page 16; • Footnote 10, page 16; • ¶ 32, page 18; • Figure 2, page 19; • ¶ 34, pages 19-20; • Figure 3, page 20; • ¶ 46, pages 27-28; • ¶ 51, pages 30-31; • Figures 4-8; pages 31-33; • ¶¶ 52-55, pages 34-37; • Heading C, page 34; • Footnote 52, page 34; • Table 1, page 35; • Footnotes 57-58, pages 35-36; • Figure 9, page 36; • Table 2, page 38; • ¶ 57, page 39; • Figure 10, page 40; • ¶ 59, pages 41-44; • Footnote 64, page 41; • Footnotes 70, 74, page 42; • Footnote 81, page 43; • Footnote 107, page 50; • ¶¶ 71-72, pages 51-53; • Footnote 114, page 53; 	Redacted

1		<ul style="list-style-type: none"> • ¶ 74, page 54; • Figure 11, page 55; • ¶¶ 83-84, pages 59-60; • Table 3, page 60; • Exhibits 1A-1D, 3A-3D, 4A-4B, 5A-5D, 6A-6E, 9A-9E, 10A-10E, 11A-11E, 12, 13B-13C, 14B, 15B-15C, 16B-16C; and • Appendices 1 and 5 	
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7		Expert Report of Elizabeth Becker, Ph.D, dated November 25, 2013:	
8		<ul style="list-style-type: none"> • ¶ 26, pages 6-8; • ¶ 34, page 10; • ¶ 35, page 10; • Footnotes 32-35, page 10; • ¶¶ 38-40, pages 10-11; • Footnote 38, page 11; • ¶¶ 43-44, page 12; • ¶¶ 50-54, pages 14-15; • Footnote 48, page 15; • ¶¶ 56-59, pages 16-17; • ¶ 62, pages 17-18; • ¶¶ 64-76, pages 18-21; • Footnote 59, page 19; • ¶¶ 78-80, pages 21-22; • Footnote 64, page 21; • ¶¶ 82-84, pages 22-23; • ¶ 86, page 23 • ¶ 89, page 24; • ¶ 92, pages 24-25; • ¶ 97, page 26; • ¶ 101, pages 26-27; • ¶¶ 109-118, pages 28-31; • Footnotes 82-83, page 29-30; • Footnote 86, page 31; • ¶¶ 120-121, page 32; • Footnotes 95-96, pages 34-35; • ¶¶ 123-125, page 33; • ¶ 132, page 35; • ¶ 135, page 36; • ¶ 139, page 37; • ¶ 142, page 37; • ¶ 144, page 38; 	
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1		<ul style="list-style-type: none"> • ¶¶ 147-149, pages 38-39; • Footnote 111, page 39; • ¶¶ 152-156, pages 40-41; • Footnote 112, page 40; • Footnote 115, page 40; • Footnote 117, page 41; • Exhibits A1-A4, A7-A11, A13-A17, B1-B5, B7-B8, C1-C3, C5, D2, E3, E6, E9, E10; • Appendices: A1, A2, A4-A11, A13-A17, B1-B4, B5-B8, C1-C5, D2, E3, E6, E9, E10; and • Attachment 3 	
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9		Expert Report of Kevin M. Murphy, Ph.D, with revised exhibits, dated August 25, 2013:	
10		<ul style="list-style-type: none"> • Exhibit 1 and ¶ 20, page 8; • Exhibit 2, page 9; • Exhibit 3, page 11; • ¶¶ 47-48, pages 21-22; • Footnote 57, page 22; • ¶ 52, page 24; • Footnote 105, pages 29-30; • Footnote 110, page 33; • ¶86, page 39; • ¶ 88-89, pages 39-40; • Exhibit 4, page 40; • Exhibit 5, page 42; • Footnote 128, page 40; • Footnote 130, page 41; • Exhibits 1A and 1B; and • Appendices C-1, C-2, C-3, D-1, D-2, D-3, and F 	
11	7		Redacted
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21		Amended Expert Report of Edward A. Snyder, Ph.D, dated December 6, 2013:	
22		<ul style="list-style-type: none"> • ¶ 36, pages 17-18; • Footnote 15, page 18; • ¶ 39, pages 19-20; • ¶ 43, page 21; and • Exhibits 3a, 3b, and 4. 	
23	8		Redacted
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26	10	Expert Report of Eric Talley, Ph.D., dated November 25, 2013:	
27		<ul style="list-style-type: none"> • Footnote 75, page 19. 	Redacted

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2	13	Rebuttal Supplemental Expert Report of Edward E. Leamer, Ph.D., dated Ju- ly 12, 2013: Redactions as previously submitted on July 19, 2013 in connec- tion with Defendants' Joint Response to Plaintiffs' Administrative Motion to File Under Seal and Supporting Decla- rations	Redacted
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9 **IT IS SO ORDERED.**

10 Date: _____

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HONORABLE LUCY H. KOH
United States District Court Judge

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